

STATE OF SOUTH CAROLINA

(Caption of Case)

IN RE:

Application of Alpine Utilities,
Inc. for adjustments of rates and
charges for the provision of sewer
service and the establishment of
additional rates and charges.

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 190 - S

(Please type or print)

Submitted by: Richard L. WhittSC Bar Number: 62895Address: Austin & Rogers, P.A.Telephone: 803-251-7442508 Hampton Street, Suite 300Fax: 803-252-3679Columbia, South Carolina 29201Other: 803-256-4000Email: rlwhitt@alrlaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☒ Request for item to be placed on Commission's Agenda expeditiously

Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit of Publication	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certification of Mailing	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input checked="" type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/>	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-190-S

IN RE:)	
)	
Application of Alpine Utilities,)	
Inc. for Adjustments of Rates and)	MOITION IN LIMINE
Charges for the Provision of Sewer)	
Service and the Establishment of)	
Additional Rates and Charges.)	
)	

INTRODUCTION

Movant, Happy Rabbit, a South Carolina Limited Partnership (hereinafter, "Happy Rabbit"), was granted Intervenor status by the Public Service Commission of South Carolina (hereinafter "Commission") by order number 2008-572, issued in this Docket on August 19, 2008. Thereafter, Happy Rabbit also filed a formal Complaint against Alpine Utilities, Inc. (hereinafter "Alpine") assigned Docket number 2008-360-S by this Commission. The subject matter of Docket number 2008-360-S is unrelated to the subject matter of Docket number 2008-190-S. Happy Rabbit's Motion follows:

MOTION IN LIMINE

Although Happy Rabbit is an Intervenor in this Docket number 2008-190-S, related to Alpine and a complainant in Docket number 2008-360-S also related to Alpine, the subject matters of each Docket are unrelated. In the interest of fairness, Happy Rabbit does not want to improperly influence this Docket number 2008-190-S, by having the pendency of its formal Complaint, cause members of the Commission to draw a negative inference against Alpine in this Docket 2008-190-S.

Accordingly, Counsel for Happy Rabbit is filing this Motion in Limine to respectfully request that Happy Rabbit's pending formal Complaint in Docket number 2008-360-S against Alpine, not be referred to, nor mentioned in any manner during the

Hearing to be held on September 25, 2008 in this Docket number 2008-190-S. Therefore, there should be no questions raised concerning Happy Rabbit's formal Complaint in Docket number 2008-360-S during the Hearing.

CONCLUSION

Therefore, if this Motion is granted, there should be no questions raised concerning Happy Rabbit's formal Complaint in Docket number 2008-360-S during the Hearing, nor no mention of Happy Rabbit's pending formal Complaint in Docket number 2008-360-S.

Respectfully Submitted,

/S/

Richard L. Whitt
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803-251-7442

Attorney for Intervenor Happy
Rabbit, a South Carolina Limited
Partnership, owners and operators of
Windridge Town Homes.

Columbia, South Carolina
September 24, 2008

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008- 190-S

IN RE: Application of Goat Island Water &)	
Sewer Co., Inc. for an Increase)	
in its Rates and Charges for the)	Certificate of Service
Provision of Water and Sewer Services)	
and Approval of Management Agreement)	

I, Katye White, an employee of Austin & Rogers, P.A., certify that I emailed a copy of Happy Rabbit's Motion in Limine, addressed as below, on the date below.

Nanette S Edwards, Esquire
South Carolina Office of Regulatory Staff
nsedwar@regstaff.sc.gov

John M.S. Hoefer
Willoughby & Hoefer, P.A.
jhoefer@willoughbyhoefer.com

/S/

• Katye White

Columbia, South Carolina
September 24, 2008